IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF OHIO

IN RE:) Case No. 15-41302
DEBTORS	Chapter 7
Michael J. Ensell and Kelly J. Ensell	Judge Kay Woods Motion to Continue the Hearing on Motion of Terry Newhart Sr., Terry Newhart Jr., Todd Newhart, North East Fire Protection LLC and 1286 Beech Street For Relief From Stay

Comes now undersigned Counsel who respectfully moves this Honorable Court to continue the hearing, presently scheduled for October 22, 2015at 9:30 A.M. As basis for this request, Counsel states she is out of the state on vacation until November 1, 2015 and is therefore unable to attend.

WHEREFORE, Counsel prays that the Court grant her motion.

/s/ Janc Timonere
Jane Timonere, Esq. (0073241)
Counsel for Debtors
TIMONERE LAW OFFICES, LLC
4 Lawyers Row
Jefferson, Ohio 44047-1099
phone: (440) 576-8406
jane@timonere.com

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2015 a true and correct copy of the foregoing Motion to Continue Hearing on Motion of Terry Newhart Sr., Terry Newhart Jr., Todd Newhart, North East Fire Protection LLC and 1286 Beech Street LLC for Relief From Stay was served via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Michael D. Buzulencia 150 E. Market Street, Suite 300 Warren, OH 44481 <u>buzulenciatrustee@mahoningvalleylaw.com</u> Chapter 7 Trustee

U.S. Trustee Howard M. Metzenbaum U.S. Court House 201 Superior Avenue, Room 441 Cleveland, OH 44114

Thomas J. Connick 25550 Chagrin Blvd., Suite 101 Beachwood, OH 44122 tconnick@connicklawllc.com Attorney for Movants

> /s/ Jane Timonere Jane Timonere, Esq. (0073241)